

RCRA Showcase Pilot - Region 6

Formosa Plastics Corporation, Point Comfort, Texas

Formosa Plastics Corporation Point Comfort facility is an EPA Region 6 - Texas Natural Resource Conservation Commission (TNRCC) Corrective Action Strategy (CAS) pilot project. Region 6 has initiated an aggressive program to assist our states in streamlining the RCRA Corrective Action Process. Over the course of the last three years Region 6 with significant input from stakeholders has developed a risk-based guide that can significantly accelerate corrective action at Resource Conservation and Recovery Act (RCRA) facilities. The Region 6 CAS is a flexible guide that can be used to enhance state specific corrective action rules and regulations by highlighting and promoting the use of flexibility found in our national corrective action policy. Under this new approach entire facilities will be evaluated as a whole, investigations and cleanups prioritized on a “worst first” basis to better focus resources (time and money), and corrective action driven by risk based decision making which accurately and realistically reflect current and future land use scenarios and beneficial use of resources.

Facility Name - Formosa Plastics Corporation
Point Comfort, Texas

The Formosa Plastics Corporation facility near Point Comfort is a 2,000 acre facility that produces PVC as an end product to sell to plastic injection and extrusion manufacturing plants. Construction of the plant began in 1980 and was in continuous production by 1983. EDC groundwater contamination is present beneath the facility. The facility has been conducting corrective action under an EPA 3008(h) enforcement order since 1991. The draft RFI was submitted in 1995, and the final RFI in 1998 which was never approved. The CAS is being conducted at this facility under a recently revised EPA 3008(h) order which incorporates CAS concepts. Formosa is a GPRA baseline facility.

Pilot Project Participants - Formosa Plastics Corporation facility representatives, Texas Natural Resource Conservation Commission (TNRCC) staff and EPA Region 6 CAS team members.

Oversight of the Formosa CAS Pilot - Oversight of this pilot will be carried out by Region 6 CAS team members. The TNRCC representative will provide technical comments.

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Innovations of the CAS Pilot Program -

- Risk based performance standards and data quality objectives have been developed which enable the facility to evaluate previously collected data. RFI reports have been in review at the site since 1995 without approval. Use of Texas Risk Reduction program screening tables to prioritize corrective action efforts based on risk, worst first approach, have focused actions at the site
- Conceptual site models have been developed for use in risk management decisions with realistic evaluation of current and future site and resource use
- Ground water management (monitoring and sampling) will use a modified COC list and go from a SWMU-by-SWMU approach to a site-wide approach
- Informal and frequent face-to-face communication throughout the process have

developed a comfort level among the regulators and the facility and have increased trust and timeliness beyond what was achieved in the past

Stakeholder Support for the CAS - EPA Region 6 sought extensive stakeholder input from states, industry, environmental groups, EPA HQs, other EPA regions, etc. during the development of the CAS. This pilot project is being conducted cooperatively with the state and facility. The CAS promotes early and continued involvement of stakeholders. Encourages states to implement their own established procedures as long as they provide public participation at key decision making stages such as, agreement on performance standards, remedy proposals, and closeout.

Benefits of the CAS - The CAS is a useful approach to corrective action for facilities that are willing to commit resources up front to manage risk at their sites. Since the CAS takes a site-wide approach to corrective action, this may result in more efficient remedy solutions. Provides a relatively easy administrative approach to conduct corrective action. Promotes a cooperative/results based working arrangement (face to face meetings, gained trust reduces review/oversight needs, allows for use of existing data meeting DQOs, etc.) Promotes early discussion of critical issues and expectations (conceptual site model, DQOs, screening criteria, performance standards, etc). Allows flexibility to achieve results (sampling programs, screening approaches, focus on what's important, recognizes that changes may be necessary throughout the process, etc.). Resource utilization can be better predicted (dollars, personnel).

Proposed Project Milestones - The Scoping meeting was held at the facility June 6-7, 2001. Amendment to the 3008(h) order to include CAS implementation will be completed in August 2001. Evaluation and revision to current groundwater monitoring and treatment program will also be completed in August 2001. Site-wide risk screening (human health and ecological) to begin September 2001. The CAS work plan is expected in September 2001.

Measuring and reporting the Progress of the CAS Pilot - EPA Region 6 CAS team members have developed a Virtual Office, which is an information-sharing extranet site, to be used by all CAS pilot project participants. Authorized users of the VO will be able to track and monitor the progress of the pilot project. Non pilot project participants will have access to pilot summary reports and schedules through an Region 6 public web page.

Application of the CAS for other projects - The CAS was developed as a tool for the states to use to expedite corrective action. The concepts in the CAS can be applied for facilities that are just beginning corrective action, facilities that are not making progress with their investigations, or for facilities that need assistance in remedy proposals. The CAS emphasizes the use of existing data, and does not require additional reporting. For states that have corrective action regulations (generally provide cleanup numbers), the CAS offers an alternative process for completion of corrective action.